Message

From: John Mays [jmays@powertechuranium.com]
Sent: 4/9/2020 4:41:04 PM
To: Minter, Douglas [Minter.Douglas@epa.gov]
Subject: RE: Alternative approach to the AE boundary and request for some data

Sounds good just let me know.

Thanks,

John

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: "Minter, Douglas" <Minter.Douglas@epa.gov>
Date: 4/9/20 06:51 (GMT-08:00)
To: John Mays <jmays@powertechuranium.com>
Subject: RE: Alternative approach to the AE boundary and request for some data

Thanks John: I plan on sending you and Ben (our FA expert) an invite to discuss coverage of your Class III wells and would suggest we address this on a separate call in the interests of Valois' and Ben's time.

I hope that is ok with you,

Douglas

From: John Mays <jmays@powertechuranium.com>
Sent: Thursday, April 9, 2020 7:44 AM
To: Robinson, Valois <Robinson.Valois@epa.gov>; Minter, Douglas <Minter.Douglas@epa.gov>
Cc: Blake Steele <blake@azargaresources.com>; Lisa Scheinost <escheinost@powertechuranium.com>
Subject: Re: Alternative approach to the AE boundary and request for some data

Valois,

It seems like it would be best for us to discuss this. Could we schedule a conference to discuss? I thought we may be able also to touch base on Financial Assurance if Douglas is ready for that discussion as well.

I believe we would be pretty wide open for a discussion timing wise, and all would be close to the same time zone, though I would suggest afternoon may be best. Would you mind suggesting a time that work for you?

Thanks.

John

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From: "Robinson, Valois" <Robinson.Valois@epa.gov>
Date: Tuesday, April 7, 2020 at 9:39 AM
To: John Mays <jmays@powertechuranium.com>
Subject: RE: Alternative approach to the AE boundary and request for some data

Thanks, John!

Valois

Valois Robinson
EPA Region 8
Underground Injection Control Program
MailCode: 8WD-SDU
1595 Wynkoop Street
Denver, CO 80202-1129
(303) 312-6276
robinson.valois@epa.gov

From: John Mays <jmays@powertechuranium.com>
Sent: Tuesday, April 7, 2020 7:59 AM
To: Robinson, Valois <Robinson.Valois@epa.gov>
Subject: RE: Alternative approach to the AE boundary and request for some data

Valois,

Good morning.

Let us consider your request and we will get back to you soon.

Thanks.

John

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: "Robinson, Valois" <Robinson.Valois@epa.gov>
Date: 4/6/20 13:17 (GMT-08:00)
To: John Mays <jmays@powertechuranium.com>
Subject: Alternative approach to the AE boundary and request for some data

Hi John,

We have been having internal discussions about the AE boundary set at 1/4 mile from the existing edge of currently identified ore deposits. Since our most recent call with you, our group pointed out to me that the 1/4 mile distance is arbitrary, which is what we were trying to avoid in the past when I wrote up that process attempting to tie the AE boundary to site-specific conditions.

As a result, we want to refine our approach to be more consistent with the requirements in the UIC regs 144.7 (c)(1):

- based on data demonstrating that the aquifer is expected to be mineral or hydrocarbon producing and

- Information contained in the mining plan for the proposed project, such as a map and general description of the mining zone

and the 146.4 (b)(1) demonstration that minerals ... considering their quantity and location are expected to be commercially producible.

As part of our approach, we want to factor in/address the uncertainty related to the number of exploratory boreholes used to delineate the wellfield areas. More specifically, the more exploratory boreholes used to map the ore zones, the more certainty we have that the ore zone boundaries are accurate, resulting in an AE boundary closer to the ore zone; while the fewer exploratory boreholes drilled to map the ore zones, the less certainty we have about the ore zone boundaries, resulting in an AE boundary further from the ore zone.

This leads me to ask if the exploration borehole map you have is GIS-based so you could select the area around each wellfield and get a count of the number of boreholes (data points) inside the area associated with each wellfield? If you could send me the number of boreholes associated with each wellfield, this would help us evaluate the validity of this approach. Please let me know if it is possible to get that borehole count without a lot of time and trouble on your end.

Thanks!

Valois

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